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July 13, 2022

VIA ECF

Honorable John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

APPLICATION GRANTED  
SO ORDERED

7/13/22   
John G. Koeltl, U.S.D.J.

Re: *Grant et al. v. Trump et al.*, Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl:

We write on behalf of Defendants Donald J. Trump and Donald J. Trump For President, Inc. (together, "Defendants") in the above-referenced action. Pursuant to Rule I.E. of Your Honor's Individual Practices, we respectfully request a further 30-day extension of the discovery period, which is currently set to end on July 21, 2022. We request this brief extension because despite diligent efforts, we have not yet been able to confirm a 30(b)(6) deposition witness, and therefore require additional time. This is the third request for an extension of the discovery schedule, and Plaintiffs' counsel have consented to this request for a 30-day extension. The first request was granted on March 31, 2022 (ECF No. 65 the "Revised Scheduling Order") and the second request was granted on June 14, 2022 (ECF No. 67). The requested extension will not affect other scheduled dates in the Case Management Plan dated November 3, 2021 (ECF No. 55) or the Revised Scheduling Order. The parties respectfully request that the Court so order the requested extension in this letter motion if it finds the same acceptable.

We appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Darren W. Saunders  
Darren W. Saunders  
PEROFF SAUNDERS P.C.

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cc: All counsel of record (via ECF)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEVIN ARORA,

**Plaintiff,**

**-V-**

BANK OF AMERICA, N.A., ET AL.

**Defendant.**

Case No. 22-cv-01402 (KMK)

**STIPULATION OF DISMISSAL  
WITH PREJUDICE AS TO BANK  
OF AMERICA, N.A.**

*Experian*

86/K Pursuant to Federal Rule of Civil Procedure 41(a)(2), it is hereby stipulated and agreed by and between Plaintiff and *Experian* Bank of America, N.A., that the above-titled action is hereby dismissed with prejudice against Experian Information Solutions, Inc. Each party will bear their own costs and attorney's fees.

/s/ James R. Ticchio  
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*Attorneys for Defendant Experian  
Information Solutions, Inc.*

SO ORDERED.



7/13/22